Response to Jean Carroll's comments: 6/17/2010

Although, I am pleased when someone agrees with me, I must clarify my stance on this issue. Apparently Ms. Carroll has misinterpreted what I thought I said. I made no reference connecting the issue of animal traceability to food safety, nor did I single out commercial feedlots as being the source of food safety or animal traceability problems.

As the government seeks information in their quest to redesign a workable animal traceability system it should go without saying that its necessary for commenters to treat the needs for tracing animal diseases separately from those necessary for tracing food born illnesses. These are altogether different issues; different causes and effects, different responses, and different jurisdictions in federal and state governments.

The main point in my original comment was, NAIS fell flat (for what ever reason) and now, because political entities seem unwilling to accept efforts of the previous administration, or to even learn from those efforts, it is necessary to go back to the drawing board. So, start over if we must, but make plans based on fact and proven needs, not on the emotional rhetoric that often spews forth during the listening sessions.

Federal and state animal health officials, having nearly 100 years of experience tracing diseases such as tuberculosis, brucellosis, scabies, pseudorabies, and hog cholera, know what the failings are with current disease tracing methods. However, the opinions of these experts were given no more credibility than the unfounded claims made by persons who accused NAIS of being a communist plot or big government's ploy to "take over" animal agriculture. The democratic way is to give everyone a vote; there is no requirement that they stick to the facts.

In this time of distrust of government and elected officials, it would be prudent to provide scientific basis to back up the the thinking of animal health officials garnered from their collective regulatory experiences. A possible solution would be to conduct real-time, real-place tracing studies for different classes of livestock (cattle in this case) moving in all potential management practices in different regions of the nation. The purpose of such a study would be to determine if randomly selected animals can be traced to their herd of birth based on the animal's identification and the paperwork available at the point of interception. Such studies could be conducted by federal and state employees whose regular job includes tracing animal disease. Such studies would be relatively inexpensive to conduct and if done correctly would be invaluable in providing a sound base for developing minimally burdensome animal identification methods necessary for tracing animal disease in a timely manner.

All this boils down to the fact that animal disease does not respect size or type of operation. Therefore, when taking into account the risks of specific livestock management practices, it is not likely that an animal traceability plan will exempt animals simply because they are located on or en route to a "small" farm.

Responsible animal agriculture which encompasses a practical animal traceability plan should not be construed as a ploy to limit anyone's right to farm.